

out of this Assurance is solely in the Chancery Court of Davidson County, Tennessee.

**12. ADDITIONAL REPRESENTATIONS AND WARRANTIES**

12.1 The parties represent and warrant, each to the other, that the execution and delivery of this Assurance is their free and voluntary act, that this Assurance is the result of good faith negotiations, and that the parties believe that the Assurance and terms hereof are fair and reasonable. The parties warrant that they will implement the terms of this Assurance in good faith. Respondent further represents that the signatory for the Respondent has the authority to act for and bind the Respondent.

**13. FILING OF ASSURANCE**

13.1 Immediately upon the execution of this Assurance, the Attorney General shall prepare and file in Chancery Court for Davidson County a Petition and this Assurance for the Court's approval. Respondent hereby waives any and all rights which it may have to be heard in connection with judicial proceedings upon said Petition. Respondent agrees to pay all costs of filing such Petition. Simultaneously with the execution of this Assurance, Respondent shall execute an Agreed Order in the form annexed hereto. The Assurance constitutes the complete agreement of the parties. The Assurance, annexed to the Agreed Order, is made a part of and is incorporated into the Agreed Order.

**14. APPLICABILITY OF ASSURANCE TO RESPONDENT  
AND ITS SUCCESSORS**

14.1 The parties agree that the duties, responsibilities, burdens and obligations undertaken in

connection with this Assurance shall apply to themselves, as well as their agents, assigns, representatives, officers, directors, employees, sales staff, and successors.

14.2 All notices required to be given to each party shall be in writing and shall be sent to the parties at the following addresses:

Cherry Communications  
c/o Peter M. Wegmann, C.E.O.  
2001 Butterfield Road  
Room 1300  
Downer's Grove, IL 60515

Steven A. Hart or Cynthia E. Carter  
Tennessee Attorney General's Office  
450 James Robertson Parkway  
Nashville, Tennessee 37243-0485

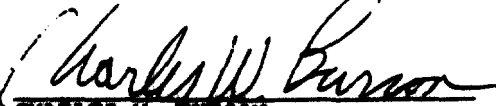
The notices shall be effective when received by each party and may be sent by certified or registered mail return receipt requested, or by overnight delivery service when proof of delivery is available. Transmission of such notice by facsimile, fax, telefax or other electronic device shall not constitute effective notice unless the parties expressly agree to such transmission in regard to the specific notice beforehand.

#### 15. COMPLIANCE WITH OTHER LAWS

15.1 IT IS ORDERED that nothing in this Assurance shall be construed as relieving Respondent from complying with any of this state's or federal laws, regulations or rules, nor shall any of the provisions of this Assurance be deemed to be permission to engage in any acts or practices prohibited by such laws, regulations, or rules.

IN WITNESS WHEREOF, the parties have set their hands as of the day and date first aforementioned.

FOR THE STATE OF TENNESSEE:



CHARLES W. BURSON

BPR No. 7775

Attorney General & Reporter



STEVEN A. HART

BPR No. 7050

Deputy Attorney General



CYNTHIA E. R. CARTER

BPR No. 13533

Assistant Attorney General

450 James Robertson Parkway

Nashville, Tennessee 37243-0485

(615) 741-3533

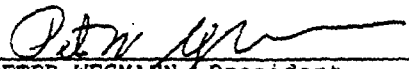
APPROVED BY:

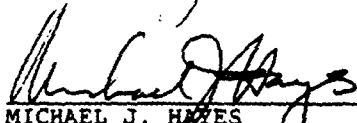


EDITH OWEN, Director

Division of Consumer Affairs

FOR THE RESPONDENT:

  
PETER WEGMANN, President  
Cherry Payment Systems, Inc.

  
MICHAEL J. HAYES  
Attorney for Respondent  
B.P.R.  
Gardner, Carton & Doulgas  
321 North Clark Street  
Chicago, Illinois 60610-4795  
(312) 245-8880

*Michael Cody*  
W. V. Michael Cody  
Attorney for the Respondent  
BPR No. 7809  
Burch, Porter & Johnson  
130 North Court Avenue  
Memphis, Tennessee 38103  
(901) 523-2311

**EXHIBIT A**

STATE OF TENNESSEE  
Office of the Attorney General



JOHN KNOX WALKUP  
SOLICITOR GENERAL

480 JAMES ROBERTSON PARKWAY  
ATTORNEY GENERAL & REPORTER  
NASHVILLE, TENNESSEE 37243-0488

TELEPHONE (615) 741-3491  
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CHARLES W. BURSON  
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JEAN NELSON  
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PERRY A. CRAFT  
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STEVEN A. HART  
DAVID M. HIMMELREICH  
CHARLES L. LEWIS  
CHRISTINE MODISHER  
MICHAEL D. PEARIGEN  
JENNIFER H. SMALL  
JERRY L. SMITH  
GORDON W. SMITH  
JIMMY G. CREECY  
CHIEF SPECIAL COUNSEL

RE: Cherry Payment Systems, Inc. d/b/a Cherry  
Communications

Dear Consumer:

As a result of a joint investigation by the Division of Consumer Affairs of the Department of Commerce and Insurance, the Public Service Commission and my Office, a settlement was reached with Cherry Communications, Inc. regarding the alleged unauthorized switching of consumer's long distance carrier service (in most cases to Matrix Telecommunications) and possible related misrepresentations. The settlement provides for the refund of monies to consumers who complained that they were injured by this company's practices. Enclosed please find a refund check which includes any service costs associated with switching you back to your pre-selected long distance carrier and, if you provided appropriate documentation, the difference, if any, between the costs of the long distance you received while you were switched by Cherry Communications to a long distance carrier rather than your pre-selected long distance carrier.

This Office, as well as the other state agencies, will continue our efforts to enforce the consumer statutes of this State and to prevent activities like these from continuing in the State of Tennessee.

Sincerely,

*Charles W. Burson*  
CHARLES W. BURSON  
Attorney General & Reporter

Enclosure:  
check

IN THE CHANCERY COURT FOR DAVIDSON COUNTY, TENNESSEE

STATE OF TENNESSEE,

Petitioner,

v.

CHERRY PAYMENT SYSTEMS, INC. doing  
business as CHERRY COMMUNICATIONS

Respondent.

No. 93-781-TTT

PETITION

Charles W. Burson, Attorney General and Reporter for the State of Tennessee, ("Attorney General") files this Petition pursuant to Tenn. Code Ann. § 47-18-107 of the Tennessee Consumer Protection Act of 1977 ("the Act"), and would respectfully show the Court as follows:

1. The Division of Consumer Affairs of the Tennessee Department of Insurance and Commerce ("Division") and the Attorney General, acting pursuant to the Act, have investigated the acts and practices of Cherry Payment Systems, Inc. doing business as Cherry Communications ("Respondent"). Upon completion of such investigation, the Division has determined that certain of Respondent's acts and practices, more specifically described in Paragraph 2 of this Petition, constitute unfair and deceptive acts or practices affecting the conduct of trade or commerce in the State of Tennessee in violation of Tenn. Code Ann. § 47-18-104(a), and further that such acts and practices constitute violations of Tenn. Code Ann §§ 47-18-104 (b)(5) and (b)(27).

2. Based upon their investigation of Respondent, the Division and the Attorney General allege the following:

2.1 Beginning late 1992, Respondent contracted with long distance service companies to solicit Tennessee consumers



to switch their long distance service from their current long distance provider to one of the companies that Respondent represented. Respondent apparently contacted consumers both in person or by telephone requesting that they switch their long distance carrier.

2.2 In November of 1992, consumers began complaining to the Attorney General, the Division of Consumer Affairs and the Public Service Commission that their long distance carrier had been switched by Cherry Communications without their consent. Some consumers were able to document that the alleged "letter of authority" ("LOA") to switch their long distance service had been forged. Other consumers complained that they were never provided the alleged "letter of authority" but stated that they had never consented to the switch of their long distance carrier and had requested a copy of the alleged LOA.

2.3 A large number of the complaints referred to in paragraph 2.2 were filed by international students at Memphis State University. These consumers stated that they had never consented to have their long distance service switched. Some consumers noted that their long distance service while switched by the Respondent was more expensive than through their pre-selected long distance carrier.

2.4 Respondent have solicited consumers both in person and by telephone requesting that the consumer switch their long distance service so that they could save "10%". Consumers may or may not have saved 10%. If the consumer had a special calling plan such as AT&T Reach Out America or MCI Friends and Family, the consumer may not have saved 10% because the savings representation was based upon standard rates rather than a "savings plan".

2.5 Respondent admitted that some former employees forged consumers' signatures to letters of authority without the permission of each consumer.

2.6 Respondent's conduct constitutes an unfair and deceptive act or practice. More specifically, Respondent has:

(a) Represented that goods or services have characteristics, uses, benefits or quantities that they do not have and

(c) Engaged in any other act or practice which is deceptive to a consumer or to any other person.

3. Respondent denies the allegations of wrongdoing in Paragraph 2.

4. Upon completion of its investigation, the Division requested the Attorney General to negotiate, and if possible to accept, an Assurance of Voluntary Compliance in accordance with the provisions set forth in Tenn. Code Ann. § 47-18-107.

5. The Attorney General entered into negotiations with Respondent and the parties have agreed to, and the Division has approved, the attached Assurance of Voluntary Compliance.

6. In accordance with the provisions of Tenn. Code Ann. § 47-18-107(c), the execution, delivery and filing of the Assurance does not constitute an admission of prior violation of the Act.

7. The Division, the Attorney General, and the Respondent, the parties who are primarily interested in the matters set forth in Paragraph 2 hereof, have jointly agreed to the Assurance of Voluntary Compliance and join in its filing.

PREMISES CONSIDERED, Petitioner prays

1. That this Petition be filed without cost bond pursuant to the provisions of Tenn. Code Ann. §§ 20-13-101 and 47-18-116.

2. That the Assurance of Voluntary Compliance be approved and filed in accordance with the provisions of the Act.

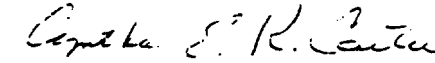
Respectfully submitted,



CHARLES W. BURSON  
Attorney General and Reporter  
B.P.R. No. 7775



STEVEN A. HART  
Deputy Attorney General  
B.P.R. No. 7050



CYNTHIA E. K. CARTER  
Assistant Attorney General  
B.P.R. No. 13533  
450 James Robertson Parkway  
Nashville, Tennessee 37243-0485  
(615) 741-3533



CALIFORNIA PUBLIC UTILITIES COMMISSION  
Carole Kretzer, Information Officer  
State Office Building, 107 So. Broadway  
Los Angeles, Ca. 90012

F-402 T-140 P-011 DEC 12 '94 15:24  
12-AUGUST 0, 1990

Phone: (213) 620-2240

**FOR IMMEDIATE RELEASE**

Pacific Bell customers who subscribed to phone service, or changed their services, and who are paying for phone services they never ordered or authorized are eligible for refunds, with interest.

Any of the utility's residential customers who paid an \$80 deposit since Sept. 1, 1985 due to Pacific Bell's incorrect application of its tariff filed with the state Public Utilities Commission (PUC), are eligible for refunds.

Also, Pacific Bell customers who would have qualified for Universal Lifeline phone service but who, perhaps unknowingly, chose more expensive service during this period are eligible for refunds.

In its latest action related to Bell's sales practices, the PUC today adopted a plan by which Pacific Bell will make refunds to customers who have paid for phone services they did not authorize.

The customer refund procedures the Commission adopted today grew out of workshops directed by the PUC on May 28. Workshops were coordinated by the PUC's Evaluation and Compliance staff. Workshop participants were Pacific Bell; the PUC staff; Public Advocates, a San Francisco-based public interest law firm; Centex Telecommunications; Toward Utility Rate Normalization, a San Francisco-based consumer group, and PUC Consumer Affairs representatives. All workshop participants agreed to the refund procedure adopted by the PUC today.

Commenting on the consensus reached by workshop participants on how to implement the PUC's March 28 directive that Pacific Bell make appropriate refunds to customers, PUC President Don Vial said: "Speaking for the PUC, I commend the workshop participants for their fine effort in achieving a speedy, but carefully-crafted resolution of the many difficult and contentious issues presented to them."

(more)

Under the adopted customer notification and refund plan, Pacific Bell will notify customers who may have been affected by the utility's marketing practices of their right to a refund, and refund to them, with interest, or make appropriate credits to their phone bill, amounts customers paid for unwanted phone services. In doing this, Pacific Bell will describe to customers the phone services for which they are now paying and give them an opportunity to remove services they do not want.

The utility will also develop simpler telephone bills that will itemize specific services for which customers are paying, and give them a regular opportunity to verify and evaluate the telephone services they receive.

Finally, today's PUC order directs the utility to file plans it will follow to better educate its employees on proper administration of California's Universal Lifeline Telephone service, (available to low income customers for as little as \$1.48 per month in most areas.)

Early this Spring the Commission staff investigated the utility's marketing practices and found the company in violation of the PUC Code, Pacific Bell's tariffs filed with the PUC, and certain PUC General Orders because it was, among other things:

- O violating a section of the PUC Code by conducting an unauthorized trial program relating to "enhanced" phone services,
- O violating a rule in its tariff filed with the PUC through its "package selling" efforts by failing to properly provide customers with price quotations that fully itemize fixed and recurring charges for the services and equipment customers requested, and
- O violating a PUC General Order which sets out the procedure for administering the Moore Universal Telephone Service Act.

On May 16, the PUC held a hearing on its Order to Show Cause why the PUC should not order Pacific Bell or any of its employees to cease and desist from abusive sales practices.

The upshot of that hearing was a ruling by PUC Administrative Law Judge Lynn Carew that Pacific Bell continue its ongoing efforts to discuss short-term remedies with parties to the proceeding, pending further direction from the PUC on May 28.

(more)

**3-3-3-Pacific Bell Refunds**

On May 28 the PUC issued a Cease and Desist Order and directed its staff to convene workshops to arrive at methods to notify customers and make appropriate refunds.

A major element of that May 28 order was that Pacific Bell was to engage in a crash educational program to teach its managers and sales representatives about basic telephone services at affordable rates made possible by the Moore Universal Telephone Service Act of 1984.

The workshops were held June 11 and 13.

Under the plan adopted today, Pacific Bell will:

- 0 notify all of its customers who may have been affected by its sales practices of their right to a refund, with interest, of amounts they paid for unauthorized or
- 0 verify for each customer the basic services to which he or she currently subscribes,
- 0 notify customers of their opportunity to correct any errors Pacific Bell made and to obtain appropriate credits or refunds.

Highlights of the notification and refund program adopted by the PUC today are that:

- 0 Pacific Bell will accept the customer's word that services billed were not authorized,
- 0 Pacific Bell will handle each case on an individual basis,
- 0 Pacific Bell will remove immediately services its customers do not want, and the period being adjusted will reflect the circumstances of each individual case,
- 0 Pacific Bell will advise customers that it will apply interest to all refunds and adjustments,
- 0 Pacific Bell will offer a refund check if the credit exceeds the customer's average monthly bill, or if he asks for a refund check,
- 0 Once a customer asks to have an existing service removed, Pacific Bell employees will not discuss optional or additional services unless the customer asks for them. Pacific Bell will reinforce the notion that it intends customers to retain only the services they actually want.

(more)

#### 4-4-4-Pacific Bell Refunds

- 0 Pacific Bell customer representatives are to verify the customer's understanding of basic service options, offer a breakdown of the new monthly service rate, and
- 0 Customer Representatives will refer any customer who is displeased with the refund or adjustment to the appropriate higher line of management.

The PUC order requires that Pacific Bell shareholders bear the cost of the refund program. The order does not rule on a \$49.5 million penalty recommended by the PUC's Public staff for the utility's abusive sales practices. Resolution of this issue is deferred to a future decision.

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FROM: PUC-UNSUBSTANTiated... TO: [redacted]  
Carole Kreiser, Information Officer  
State Office Building, 107 So. Broadway  
Los Angeles, Ca. 90012

Phone: (213) 620-2240

FOR IMMEDIATE RELEASE

The California Public Utilities Commission today issued an emergency order requiring Pacific Bell to remedy alleged abusive sales practices.

Following numerous customer complaints and a highly critical staff report, the PUC took the unusual action of requiring immediate interim resolution of problems currently being reviewed in Pacific's rate case. Among the problems cited by the PUC order are:

- 0 Failure to provide customers with a full itemization of monthly and one-time charges applicable to residential services;
- 0 Failure to waive the deposit for connecting Lifeline service customers, as required by Pacific's tariffs;
- 0 Requiring deposits of residential customers who are not, under Pacific's tariffs, required to make them; and
- 0 Adding services and associated charges to residential customers' bills without customer authorization.

Today's order requires Pacific to show why it should not immediately remedy these sales practices, bring their sales practices in line with the tariffs and orders of the PUC, and provide customers with an opportunity to verify the services they have and discontinue those options they do not want.

In reviewing the matter, PUC President Donald Vial commented that "we cannot permit the public's confidence in Pacific, as a provider of monopoly services, to be undermined by sales practices. If the allegations are true, they are not only serious tariff violations, they amount to a breach of public trust.

(more)

## 2-2-2-2-PacBell Practices

"The commission has worked hard to keep basic exchange rates low in the face of national policies which shift more network costs onto the local exchanges. We do not want those basic rates to be obscured by Pacific efforts to promote optional services.

"Our action is not intended to prejudge rate case issues, but to increase customer awareness of services they have and to discontinue services they did not intend to order."

The commission has scheduled a one-day hearing on today's order on May 16 in San Francisco.

1 1 1

FROM : PUC-CONSUMER-H-PIKE-... TO : 10014001  
CALIFORNIA PUBLIC UTILITIES COMMISSION  
Carole Kretzer, Information Officer  
State Office Building, 107 S. Broadway  
Los Angeles, CA 90012

F-402 T-140 P-005 DEC 12 '94 15:22

030-February 23, 1990

Phone: (213) 620-2240

CONTACT: Dianne Dierstein, San Francisco (415) 557-3914

FOR IMMEDIATE RELEASE

FINAL REPORT OF CUSTOMER MARKETING OVERSIGHT COMMITTEE

The California Public Utilities Commission (CPUC) today adopted final recommendations of the Customer Marketing Oversight Committee (Committee) regarding Pacific Bell's (Pacific) marketing practices, lifted the ban on "cold-selling" telecommunications services, and referred the Committee's recommendation to clarify eligibility for Universal Lifeline Telephone Service to the CPUC's Lifeline proceeding. The Committee's work is done and its term has ended.

Following an investigation into Pacific's marketing activities, in 1986, the CPUC determined that Pacific had violated several provisions of the Public Utilities Code (Code) and ordered the utility to: stop those activities, refund overcharges to affected customers (as of January 1989, Pacific had refunded \$63 million to residential and small business customers at a cost of \$15.8 million to shareholders), and pay a \$16.5 million penalty (derived entirely from shareholders) to fund educational programs to help consumers make informed choices about telecommunications services and equipment options.

In addition, a "Customer Marketing Oversight Committee" was established to ensure that Pacific's future marketing practices would comply with the Code. The Committee was composed of utility industry representatives, Pacific Bell managers and employees, CPUC staff, consumer groups, residential and business telephone customers, senior citizens, and representatives of minority communities served by Pacific.

The Commission directed the Committee to look at: what incentives and quotas Pacific imposed on its employees selling phone services to residential and business customers; trial offerings of services; renaming and packaging of services; how deposits were administered; how Universal Lifeline Telephone

( more )

service was administered; and cold-selling telemarketing. The Commission also asked the Committee to suggest safeguards to prevent future marketing problems.

In a report it submitted to the Committee, Pacific detailed corrective steps it had taken to ensure compliance with the Code. In addition, Pacific established an Advisory Council on Ethics, an Ombudsman, implemented expanded ethics training for its employees and established: a new sales quota policy, itemized billing, confirmation letters to customers ordering new services, and quality control checks.

The Committee approved Pacific's selection of an independent research firm to "provide an independent, objective, on-going 'audit' of Pacific Bell representatives' handling of calls that result in some type of service order activity to [ensure] that customers are (1) not being pressured into taking services they do not want or need, (2) not receiving services they do not want or did not order, and (3) being told about the availability of Universal Lifeline Service if they are [now customers] and qualify for the service."

The audit will be done quarterly for the next five years and will be monitored by the CPUC to ensure that the internal safeguards Pacific has implemented continue to be effective. The first audit will cover the first quarter of 1990 and is due on or before May 31 of this year. The costs of the audit will be borne by Pacific's shareholders.

Pacific Bell must file each audit in the on-going 'forum' proceeding, established today by a separate Commission decision, which will allow customers, competitors, and others to raise issues regarding regulation of Pacific Bell which previously would have been raised in general rate cases. In addition, Pacific must provide each report to parties to this case and to the former members of the Customer Marketing Oversight Committee.

The Committee also recommended clarification of the circumstances under which a household participating in the Universal Lifeline Program can have an extra telephone number and service, and this will be considered as part of the CPUC's separate ongoing proceeding focusing on lifeline service.

# # #

CALIFORNIA PUBLIC UTILITIES COMMISSION  
Carole Kretzer, Information Officer  
State Office Building, 107 So. Broadway  
Los Angeles, Ca. 90012

19-February 11, 1987

Phone: (213) 620-2240

**FOR IMMEDIATE RELEASE**

Beginning March 1, Pacific Bell will provide its residential customers monthly bills which itemize each charge on the bill. The California Public Utilities Commission issued the order as a result of its investigation into Pacific's marketing practices.

The most significant change in the billing itemization is the explicit categorical distinction between basic services and optional services. Basic service includes flat rate, measured, or lifeline services. Optional services include Touchtone, Unlisted Telephone, Call Bonus and Call Waiting.

Other charges which are already itemized and will continue to be itemized include the Federal Communications Commission access charge, rate surcharge, state regulatory fee, Communication Devices Funds for Deaf and Disabled, taxes, and late charges.

On an interim basis, Pacific is authorized to include Foreign Exchange Service monthly charges under basic services and Foreign Exchange Service mileage charges under optional services. The PUC granted the authorization with the condition that Pacific file, no later than June 30, to effectively include both Foreign Exchange Service charges under optional services.

Today's resolution also directs Pacific to submit, no later than April 1, a specific plan to itemize billing for its business customers. April 1 is also the beginning date for quarterly reports that Pacific must submit to determine if there is a need to inform Call Bonus residential customers of whether or not they benefit from any of the Call Bonus plans, based on their actual toll usage patterns. The resolution, unanimously adopted today by the PUC, is effective immediately.

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STATE OF WISCONSIN  
DEPARTMENT OF JUSTICE

DONALD J. HANAWAY  
ATTORNEY GENERAL

Mark E. Musolf  
Deputy Attorney General

114 East. State Capitol  
P.O. Box 7857  
Madison, WI 53707-7857  
608/266-1221

For More Information Contact  
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608/266-1221  
Assistant Attorney General  
Steve Nicks 608/266-2426

For Release  
Thursday  
March 30, 1989

STATEMENT BY ATTORNEY GENERAL DON HANAWAY

The Wisconsin Public Service Commission has concurred with the Wisconsin Department of Justice's recommendation for further investigation and possible civil proceedings against Wisconsin Bell for alleged violations of PSC rules on marketing of optional residential telephone services.

The PSC decision came after DOJ presented to the PSC a report of a preliminary investigation of Bell. DOJ conducted the preliminary investigation.

The PSC asked our department in August of 1988 to investigate allegations that, among other matters, Wisconsin Bell was packaging optional services, such as touch-tone or call-waiting, with its basic rate in a manner not allowed by PSC rules.

If this practice exists, it could lead to consumers being forced to pay for unwanted or unnecessary phone services.

The state Justice Department's Office of Consumer Protection and Citizen Advocacy interviewed more than 400 Bell customers across the company's service territory from Superior to Kenosha, Madison to Milwaukee and parts between.

The interviews were the most ever conducted in a Department of Justice consumer case and suggest that sufficient grounds exist to continue the investigation.

###







STATE OF WISCONSIN  
DEPARTMENT OF JUSTICE

DONALD J. HANAWAY  
ATTORNEY GENERAL  
Mark E. Musolf  
Deputy Attorney General

114 East. State Capitol  
P.O. Box 7857  
Madison, WI 53707-7857  
608/266-1221

For more information contact  
Attorney General Don Hanaway  
608/266-1221

For Release  
Thursday  
July 27, 1989

MADISON -- Attorney General Don Hanaway announced today the filing of a consent judgment under which Wisconsin Bell has agreed to pay \$1.2 million in civil forfeitures and penalty assessments to the state -- the largest forfeiture in the history of the Wisconsin Department of Justice -- for "packing" optional telephone services onto the bills of unsuspecting residential customers. The complaint alleged violations of both the state's deceptive practices act and various Public Service Commission rules.

Hanaway also said Wisconsin Bell will make full restitution, including 8 percent interest, in a unique consumer honor system refund program.

"Notices in clear language will be mailed by Wisconsin Bell to between 500,000 and 1 million residential customers announcing they can cancel various optional services they did not want or had not ordered and are entitled to a full refund," Hanaway said. "The company also will take out full-page newspaper advertisements to alert the widest number of customers about the restitution program."

He said individual refunds will range from a few dollars to more than \$500, and that customers will decide for themselves whether they have refunds due them.

The services covered in the settlement are Touch-Tone; custom-calling features such as call-waiting, call-forwarding, speed-calling and three-way calling; and optional calling plans such as Value-Visit and Flex-A-Visit.

Hanaway said the alleged violations by Wisconsin Bell were "widespread, frequent and willful."

"Customers were charged for optional services often without being told that such services were optional," the Attorney General said. "Other times, optional services were